



# RELOCATION PLAN

CARE HOUSING | SWALLOW HOUSING PROJECT

## ABSTRACT

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Paragon Partners Ltd. (Paragon) is the relocation consultant tasked with providing relocation advisory services for the Housing Catalyst/CARE Housing, Inc. Swallow Housing Renovation Project which will require temporary and permanent relocation services. Paragon has researched and prepared a comprehensive Relocation Plan that provides a summary and statistical information regarding the impact of the project on displacees.



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## I. INTRODUCTION

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CARE Housing is a community based non-profit organization founded in 1992 to help meet the housing needs of low and moderate income households in Northern Colorado. Currently, CARE Housing owns and operates 324 units of affordable rental housing.

Housing Catalyst is the largest affordable housing developer and property management company in Fort Collins with over 1,000 units of affordable rental housing. Established in 1971, Housing Catalyst has over 45 years of experience in developing housing, managing properties, and providing services for the community's most vulnerable people. It is a quasi-governmental organization created by the Fort Collins City Council and established under state law to provide safe housing for low and moderate income households within the City of Fort Collins and Larimer County.

CARE Swallow is a 40-unit multifamily affordable housing community located at 1303 West Swallow Road in Fort Collins. The community includes 10 residential buildings, common laundry area, a community clubhouse, office space, and a playground and community garden. VOS is a 44-unit multifamily affordable housing community located at 1403 West Swallow Road in Fort Collins. It includes 11 residential buildings.

Currently, the adjacent properties are under separate ownership by CARE and Housing Catalyst but will ultimately be combined and sold into a LLLP upon closing of tax credit partnership. Housing Catalyst will act as Developer for the rehabilitation project, and CARE will be the General Partner and ultimate owner/manager.

The Swallow Road Project (Project) includes the permanent acquisition and renovation of the Swallow Road Apartments and will require two types of relocation:

- Temporary Relocation
- Permanent Relocation

CARE Housing, Inc. has engaged the services of Paragon Partners, Ltd., a firm specializing in the administration of the Uniform Relocation Act and temporary relocation.

### TEMPORARY RELOCATION

All residents living in the 84 units at the Swallow Road Apartments have been provided with appropriate required General Information Notices or Move-In- Notices, depending on date of move-in.

The comprehensive renovations of the apartments will require that each of the 84 units be vacated for a period of four to eight weeks. In order to provide the General Contractor with access to each unit for this period, current residents that will continue to live onsite will experience one of the following situations:

Temporary relocation to an on-site apartment. Beginning in March 2020, property management staff have been holding vacant units for use as temporary housing units during renovation. A professional moving company will move resident belongings to the temporary unit and back to a renovated unit after construction.

**OR**

Whenever possible and appropriate, residents will be moved one time from their current apartment directly into a renovated unit. Residents who meet the income requirements have the right to return to a comparable unit upon renovation. Property Management staff estimates that at least 25% of all residents will choose to move directly to a renovated unit.

In the event that an appropriate onsite unit is not available for temporary housing, residents will be accommodated in another property operated by CARE Housing or Housing Catalyst or in a local motel.

Paragon Partners, Ltd. will provide temporary relocation assistance consulting and training to the Swallow Road Housing Catalyst/CARE team. This includes meeting remotely with Housing Catalyst/CARE representatives to instruct them on the process and ensuring compliance with all applicable requirements, including the Department of Housing and Urban Development (HUD Handbook 1378). Paragon Partners, Ltd. will also provide samples of notices, forms, and files and continue to provide consultation for the forms, move in/out schedules, procurement of all services required for temporary relocation (e.g., moving companies), resident networking, and providing payments, as required.

## PERMANENT DISPLACEMENT AND RELOCATION

Financial sources for the project include the federal Community Development Block Grant, triggering the Uniform Relocation Act. It appears that 6 units will be out of compliance or permanently displaced and relocated under the provisions of the Uniform Relocation Act.

If any households are permanently displaced, CARE Housing, Inc. will follow URA guidelines regarding permanent relocation.

## RELOCATION BUDGET

### ESTIMATED RELOCATION COSTS

**\$400,000**

## PURPOSE OF THE RELOCATION PLAN

The purpose of the relocation plan is to provide the public with information about the impacts of the proposed Project on residential occupants to be temporarily or permanently displaced and to develop solutions to minimize the impacts of these displacements. More specifically, the primary objectives of the relocation plan are as follows:

1. To conduct a survey of relocation needs of the households displaced by the proposed Project.
2. To perform an analysis of the relocation needs of impacted individuals and families. This includes a determination of the location factors and characteristics required in identifying comparable replacement housing sites. The replacement housing sites should exhibit:
  - a. Comparability to the displacement unit
  - b. Compliance with applicable local housing codes
  - c. Decent, safe, and sanitary condition
  - d. Affordability to the displaced person
  - e. Availability in areas which are compatible with the housing needs and location factors identified in the survey
  - f. Availability on the market
  - g. Availability to displacees without regard to age, race, color, religion, sex, marital status, or national origin
3. To conduct a survey and analysis of available relocation resources. This survey will aid in determining whether comparable replacement resources are available to the affected residences.
4. To outline CARE's relocation procedures, funding sources, and time frame for relocation activities. This is to assure that uniform, fair, and equitable treatment is provided to all displacees of the proposed Project.
5. To determine the needs of displacees as well as the potential costs to effectively relocate the displacees.
6. To determine any need for Last Resort Housing for relocation of any household that will require financial assistance beyond the limits set by state statute.

## PUBLIC PARTICIPATION

CARE will ensure the following:

1. Timely and full access to all documents relevant to the relocation program. CARE will only restrict access to material where its confidentiality is protected by law or its disclosure is prohibited by law.
2. The information in documents provided does not compromise the privacy of eligible persons.
3. The provision of technical assistance necessary to interpret elements of the relocation plan and other pertinent materials.
4. A general notice of the relocation plan shall be provided to all displacees within the proposed Project area. The draft relocation plan will also be available for public review for 30 days and may be distributed to displacees, interested citizen groups, and other public agencies for review and comment.
5. Copies of the relocation plan shall be available for review within 30 days of final approval. Comments from displacees and other interested persons regarding the relocation plan should be sent to:

Cheryl DeMucci  
Paragon Partners, Ltd.  
5660 Katella Avenue, #100  
Cypress, CA 90630

**OR**

Dustin Barrington  
CARE Housing  
1303 W Swallow Road  
Fort Collins, CO 80526

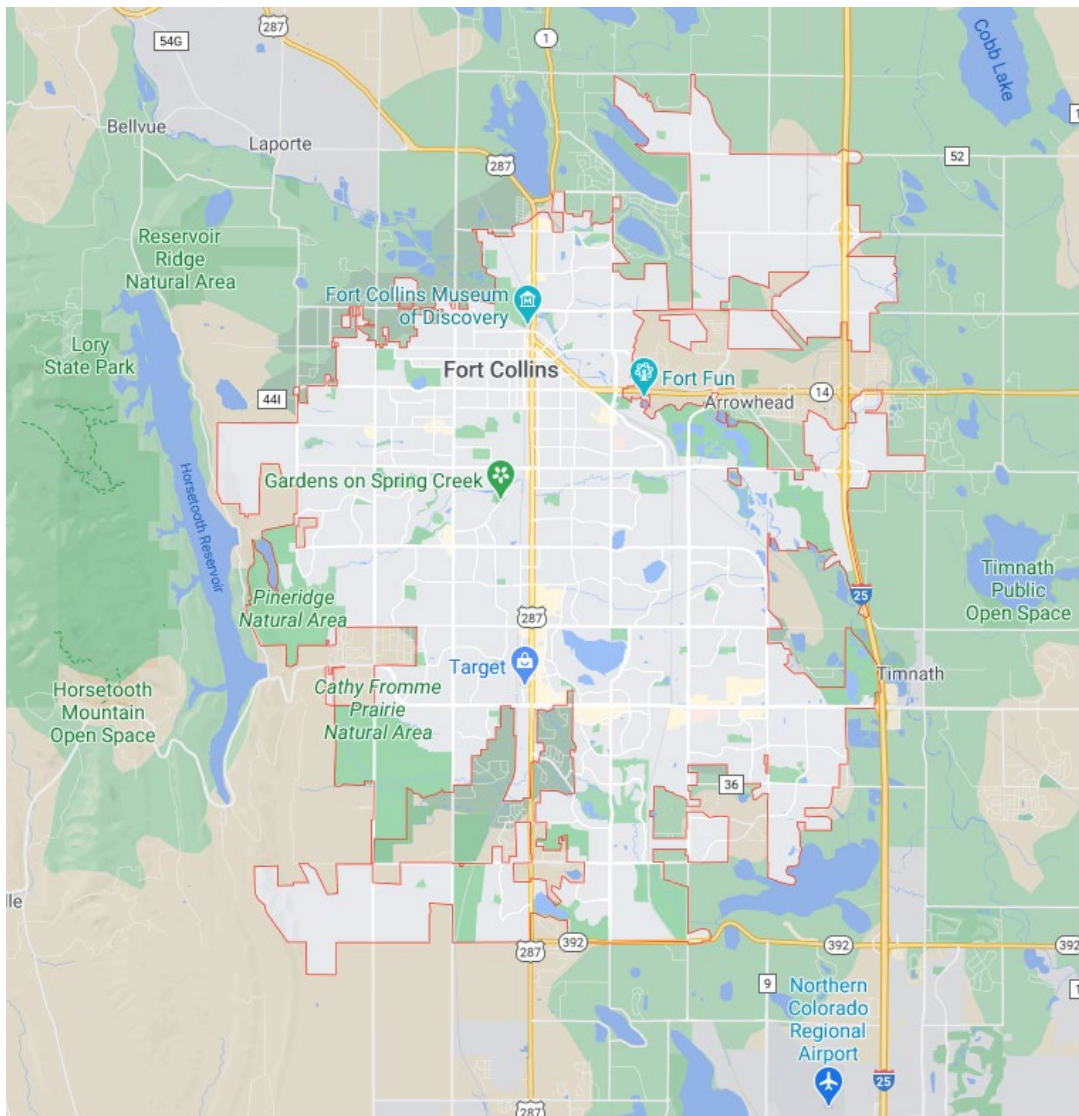
6. The right of any person to submit written or oral comments and objections to the relocation plan.
7. Prompt written responses to any written comment, objection, or criticism.
8. Upon receipt of public comments, the relocation plan will be reviewed to ensure that it is feasible, complies with applicable environmental standards, locally adopted rules, and applicable laws and regulations.
9. Public comments will be included in the final relocation plan.

## II. PROJECT DATA

### REGIONAL LOCATION AND DESCRIPTION

Fort Collins is a municipality in northern Colorado, which serves as the seat of Larimer County. Situated on the Cache La Poudre River along the Colorado Front Range, Fort Collins is located 56 mi (90 km) north of the Colorado State Capitol in Denver. Figure 1 below, is a map showing the regional location of the Project.

**FIGURE 1: Project AREA REGIONAL MAP**

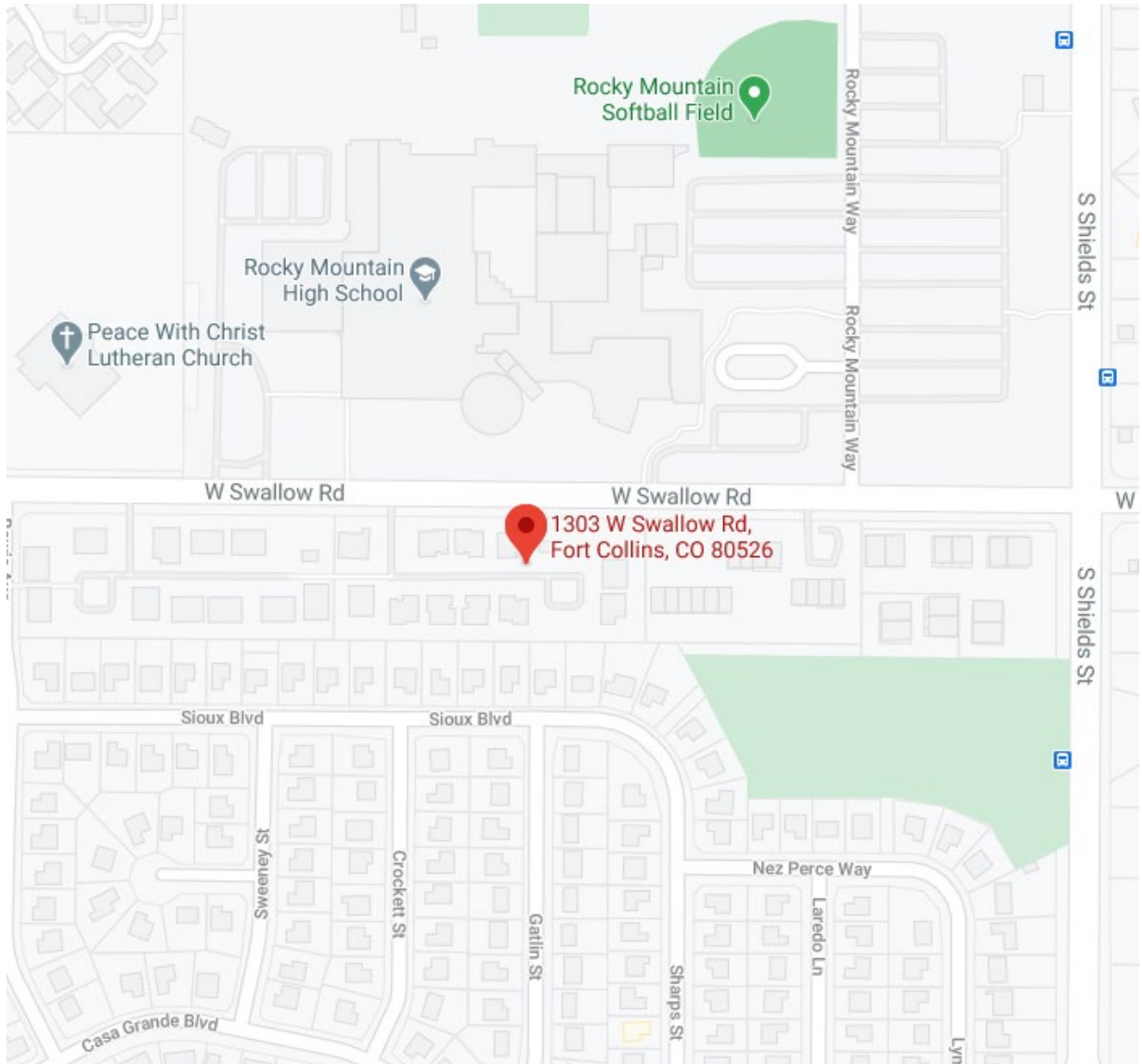




### SPECIFIC PROJECT LOCATION

The Project area is located at 1303 & 1403 W Swallow Road, Fort Collins, CO 80526 and is bounded by residential uses. **Figure 2** below depicts the Project Area.

**FIGURE 2: PROJECT AREA**



## DEMOGRAPHICS

Tables 1 and 2, below, compare census data between the City of Fort Collins and impacted Census Tract (11.07), within which the Project is located. Data is based on the 2010 US Census.

**TABLE 1: 2010 CENSUS POPULATION – CITY OF FORT COLLINS AND IMPACTED CENSUS TRACT**

POPULATION	CITY		NUMBER OF PERSONS WITHIN THE TRACTS	
		%		%
White	128,211	89	4,730	88.8
Black or Africa American	1,740	1.2	104	2
American Indian or Alaska Native	933	0.6	38	0.7
Asian	4,222	2.9	121	2.3
Native Hawaiian or Other Pacific Islander	128	0.2	4	0.07
Some Other Race	4,339	3	159	3
Two or More Races	4,413	3.1	173	3.2
Total Population	143,986	100	5,329	100
Hispanic or Latino (of Any Race)	14,572	10.1	552	10.4

**TABLE 2: 2010 CENSUS HOUSING UNITS – CITY OF FORT COLLINS AND IMPACTED CENSUS TRACTS**

TYPE	CITY		NUMBER OF UNITS WITHIN THE TRACTS	
		%		%
Owner-Occupied	31,864	55.1	1,288	58.4
Renter-Occupied	25,965	44.9	917	41.6
Total Occupied Units	57,829	100	2,205	100
Available for Sale Only (of Total Vacant Units)	477	17.8	14	20.6
Available for Rent - Full Time Occupancy (of Total Vacant Units)	1,213	45.4	29	42.6
Sold or Rented - Total Occupied	231	8.6	11	16.2
Otherwise Not Available (e.g. seasonal, recreational, migratory, occasional use)	352	13.2	12	17.7
Other Vacant	401	15	2	2.9
Total Vacant Housing Units	2,674	100	68	100

### III. ASSESSMENT OF RELOCATION NEEDS

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#### SURVEY METHOD

To gather the necessary information for the relocation plan, personal interviews were conducted with residents impacted within the Project area in both November and December of 2020. The occupants were asked about the household characteristics, such as the number of occupants, unit size, length of occupancy, disabilities or special needs, household income, and the desired area for a replacement dwelling. The information provided by the respondents has not been verified and is based solely on verbal information, which is sufficient for the purpose of completing the relocation plan.

#### RESIDENTIAL DATA AND NEEDS ASSESSMENT

##### FIELD SURVEY DATA

There were 35 total surveys completed by households and 34 did not respond to the survey. The monthly rent for residents of Housing Catalyst ranges from \$954 to \$1,568 with an average rent of \$1,210. The monthly rent for CARE Housing residents ranges from \$681 to \$1,121 with an average rent of \$901. Between both Housing Catalyst and CARE Housing there are (42) 2 bedroom units and (42) 3 bedroom units. A total of 30 households require subscription transfers (i.e. internet, phone, television, etc.).

The respondent households include a total of 104 individuals. English is the primary language spoken by all 35 respondent households therefore all respondent households do not require an interpreter. A total of 20 households considered relocating to a comparable unit and 14 households considered relocating to another CARE property.

##### HOUSEHOLDS WITH SENIOR OR PERSONS WITH DISABILITIES

A total of 9 households reported having a person with a disability and 10 households reported having a senior person.

##### INCOME

Qualifying for CARE Housing affordable rental housing is based on your household's income. Income Guidelines are the total combined gross income for the household. Guidelines for various household sizes need to be met to be eligible for housing programs. Area Median Income (AMI) requirements vary by apartment and property. The guidelines are based on median incomes for Larimer County as set annually by the U.S. Dept. of Housing and Urban Development (HUD).

**TABLE 3: INCOME GUIDELINES FOR 30%-60% OF AREA MEDIAN INCOME (AMI) FOR LARIMER COUNTY 2020**

AMI	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person
60%	\$41,760	\$47,760	\$53,700	\$59,640	\$64,440	\$69,240
50%	\$34,800	\$39,800	\$44,750	\$49,700	\$53,700	\$57,700
45%	\$31,320	\$35,820	\$40,275	\$44,730	\$48,330	\$51,930
40%	\$27,840	\$31,840	\$35,800	\$39,760	\$42,960	\$46,160
30%	\$20,880	\$23,880	\$26,850	\$29,820	\$32,220	\$34,620

**REPLACEMENT HOUSING NEEDS**

Replacement housing needs for eligible tenant occupants are based on the ratio of the household's number of bedrooms, and on the number of persons who are lawfully present in the U.S. Under this Plan, CARE has adopted a "2+1" occupancy standard. This is acceptable to HUD and is also reasonable under the Fair Housing Act. This policy allows for two occupants per bedroom and one occupant able to occupy a separate living, den or family room based on the number of lawfully present persons in the household. Thus, a one-bedroom dwelling may accommodate three people; a two-bedroom may accommodate up to five people, and a three-bedroom up to seven people.

Referrals presented to any potential tenant displacee and based on the number of lawfully present persons in the household will reflect the appropriate bedroom count as required by any municipal standards. Two of the households are "underhoused" and will not need to be referred to a unit with a greater number of bedrooms. Please refer to Table 3 on the following page for type of replacement dwellings needed for the eligible occupants.

## IV. RELOCATION RESOURCES

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The information gathered from the on-site interviews was used as the basis for a Resource Survey conducted during November and December of 2020 to determine the availability of replacement rental housing. The following sources were utilized:

- Classified rental listings from local newspapers and For Rent publications
- Multiple-Listing Services
- Internet resources

### PERMANENT RELOCATION

Tenants who require permanent relocation assistance will be provided the following assistance:

Relocation Advisory Services.

- They are entitled to receive current and continuing information on available comparable replacement units and other assistance to help you find another home and prepare to move.
- Payment for Moving Expenses. Based on HUD
- Replacement Housing Payment. Tenants may be eligible for a replacement housing payment to rent or buy a replacement home. The payment is based on several factors including:
  - (1) the monthly rent and cost of utility services for a comparable replacement unit,
  - (2) the monthly rent and cost of utility services for the present unit, and
  - (3) 30% of your average monthly gross household income. This payment is calculated on the difference between the old and new housing costs for a one-month period and multiplied by 42.

### TEMPORARY RELOCATION

Tenants who are temporarily relocated will be provided the following assistance:

- Payment for Moving Expenses. Tenants are entitled to be reimbursed for all reasonable out-of-pocket expenses incurred in connection with any temporary move. A relocation claim form will be prepared and submitted to CARE for payment.
- The location of your temporary replacement unit will be at a CARE unit. This temporary housing has been determined to be decent, safe and sanitary.

CARE will be responsible for assisting each household in relocating to comparable replacement housing. Any replacement housing unit approved by CARE must meet decent, safe and sanitary housing requirements in accordance with the Uniform Act. The following is general information on what is comparable (defined at 49 CFR Part 24, §24.2(a)(6)). When inspecting potential replacement housing you should consider the following:

- Decent, safe and sanitary (defined at 49 CFR Part 24 sec. 24.2(a)(8)).
- Functionally equivalent
- Adequate in size to accommodate the occupants.
- In an area not subject to unreasonable adverse environmental conditions.
- In a location generally not less desirable than the location of the displaced person’s dwelling with respect to public utilities and commercial and public facilities, and reasonably accessible to the person’s place of employment.
- On a site that is typical for residential development with normal site improvements, including customary landscaping. The site need not include special improvements.
- Currently available to the displaced person on the private market.
- Within the financial means of the displaced person.
- For a person receiving governmental housing assistance before displacement, a dwelling that may reflect similar governmental housing assistance.

**RESIDENTIAL PROPERTY FOR RENT**

The survey identified properties in Fort Collins. However, as with any resource survey, results reflect conditions at a given point in time, and individual units may or may not be available at the time of displacement. A total of 47 for rent units in Fort Collins were identified. Rental housing survey data is summarized in Table 4 below:

**TABLE 4: AVAILABLE REPLACEMENT SITES – RENTAL HOUSING**

NO. DWELLINGS AVAILABLE (NEEDED)	NO. BEDROOMS	ASKING PRICE RANGE AND MEDIAN
25 (4)	2	\$1,503 - \$1,882 \$1,693
22 (2)	3	\$1,600 - \$2,429 \$2,015

The housing resource survey indicates that there is an ample supply of comparable rental property available to the displacees. While adequate replacement sites are available, current rents paid by displaced occupants may increase. Any such rent increases will be addressed through CARE’s obligation under the relocation program, including Last Resort Housing requirements, as described within Section V of this Plan.

**TEMPORARY RELOCATION**

Under the Uniform Act, a person to be temporarily relocated is not considered a Displaced Person. Temporary relocation occurs when an occupant must vacate their dwelling as a result of a project, but is expected to return to the property within 12 months. A displacing organization which fails to meet its obligation to return a temporarily relocated person to the project within one year may

be liable for all costs connected with a subsequent permanent displacement of the person beginning at the end of the one year period (including a Replacement Housing Payment).

## PROGRAM ASSURANCES AND STANDARDS

There are adequate funds to relocate all the households that would be displaced if the Project is implemented. Relocation Services will be provided to ensure that displacement does not result in different or separate treatment of households based on race, nationality, color, religion, national origin, sex, marital status, familial status, disability, or any other basis protected by the federal Fair Housing Amendments Act, the Americans with Disabilities Act, Title VI of the Civil Rights Act of 1964, Title VIII of the Civil Rights Act of 1968, and the Unruh Act, as well as any other arbitrary or unlawful discrimination.

## COMPETING PROJECTS

There are other active and proposed projects in the neighboring communities. However, these projects, individually or combined, are not on a scale that would negatively impact the availability of replacement housing for the Project area residents.

## SUMMARY

The purpose of this Plan is to evaluate and assess the needs of residential occupants impacted by the proposed Project. Based on information gathered from interviews, site inspections and survey data, a sufficient number of comparable replacement dwellings are available to successfully relocate the impacted households.

## V. RELOCATION ASSISTANCE PROGRAM

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CARE will implement a comprehensive Relocation Assistance Program, which consists of advisory and financial assistance. Services will be provided in such a manner as to minimize hardship, ensure consistent and equal treatment of residents, without regard to race, nationality, color, religion, national origin, sex, marital status, familial status or disability. These principal components will be implemented in accordance with the Uniform Act.

### ADVISORY SERVICES

Individuals and/or families moving from and returning to existing homes as a result of the Project will receive advisory assistance from CARE, including the following:

- Provide all required notices
- Determine the needs of residents eligible for relocation assistance
- Provide reasonable services and assistance to successfully relocate residents
- Provide advisory assistance including assistance with filing a formal grievance or appeal

### TEMPORARY RELOCATION BENEFITS TO OCCUPANTS

Relocation benefits will be paid in accordance with CARE's administrative procedures. Protections under a temporary move are limited to payment of all reasonable out-of-pocket expense incurred in connection with the temporary move. These include: moving expenses to and from the temporary location, including full replacement value insurance, storage of personal property, the reasonable cost of housing during the temporary relocation, and coordinating move back to renovated unit.

### PERSONAL PROPERTY MOVE

CARE will pay for the actual cost of the move to and from the temporary relocation site. Assistance with restocking will be available for those who have made this request.

### STORAGE

Typically, in the event that storage of personal property is required, the resident may pay the storage facility directly and seek reimbursement from CARE or request a direct payment to the storage facility. Storage expenses must be pre-approved. However, if needed, CARE will provide onsite storage and storage of specialty items within their indoor storage facility, as appropriate.



## TEMPORARY SITE RENT

Payment of any reasonable increase in rent from the subject site to the temporary relocation site is an eligible expense. However, CARE has chosen to pay the entire rent for the temporary unit in full, including any necessary pet deposits. Each impacted household will need to continue to pay CARE Housing or Housing Catalyst the entire rent for its subject unit, in accordance with the individual rental agreement. For those opting to stay with friends or relatives during the temporary move, payment for the cost for temporary housing may not exceed that which would have been paid to CARE Housing or Housing Catalyst, and must be documented with a written rental agreement.

## MISCELLANEOUS EXPENSES/INCIDENTALS

Incidentals at the temporary unit such as long distance phone calls, etc., which are not a direct result of the temporary relocation are ineligible for reimbursement. Given that each unit will have a fully functional kitchen, there will be no per diem allowance authorized.

## PERMANENT RELOCATION BENEFITS TO RESIDENTIAL OCCUPANTS

Displaced occupants are also eligible for relocation benefits. These benefits are limited to those necessary for the rental or purchase of a comparable replacement property and moving costs of personal property. As part of ongoing advisory assistance, each displacee will be counseled as to available options and the consequences of any choice with respect to financial assistance. Moving costs and relocation benefits will be paid upon submission of required claim forms and documentation in accordance with HOPE, Inc.'s administrative procedures. These include:

## MOVING EXPENSE PAYMENTS

Any displaced person who lawfully occupies the property being acquired, regardless of the length of occupancy, will be eligible for payment of moving costs associated with personal property located at the displacement site. Displacees may choose either a fixed moving payment based on a room count schedule, or reimbursement of actual costs associated with a move completed by a professional mover.

## FIXED PAYMENT (ROOM COUNT SCHEDULE)

The fixed moving payment is a one-time allowance for a self-move that does not require back-up documentation. The current schedule for fixed moving payments is set forth in Table 5 below:

**TABLE 5: FIXED MOVING SCHEDULE****FURNISHED ROOMS**

ROOM COUNT	PAYMENT
1 Room	\$675
2 Rooms	\$895
3 Rooms	\$1,115
4 Rooms	\$1,270
5 Rooms	\$1,425
6 Rooms	\$1,580
7 Rooms	\$1,735
8 Rooms	\$1,890
Each additional room	\$155
Occupants-Unfurnished Rooms	
1 Room not furnished	\$385
Each additional room	\$55

**ACTUAL COST (PROFESSIONAL MOVE)**

The displacee may elect to retain the services of a licensed professional mover, in which case CARE will pay for the actual cost of the move within a 50-mile radius from the subject property, based on the lower of two acceptable moving bids. After the move is completed, the displacee may pay the mover directly and seek reimbursement from CARE or request a direct payment to the mover.

**RENTAL ASSISTANCE PAYMENTS TO TENANT OCCUPANTS**

In addition to a payment for moving expenses, residential tenants who have established their residency in the displacement dwelling at least 90 days prior to the first written offer by CARE for the property acquisition will be eligible to receive a Rental Assistance Payment (RAP). Payment to residential tenants is determined on the basis of their current rent, their ability to pay if they qualify as Low Income under HUD income standards, market rent of a comparable replacement dwelling, and the actual rent of the replacement unit, plus any estimated cost increase for utilities. Except in the case of “Last Resort Housing” situations, and pursuant to the Uniform Act, any RAP is limited to a maximum of \$7,200. Last Resort Housing assistance is authorized when comparable replacement housing is not available at rental rates within the tenant’s financial means. Please see Table 6 below for a sample RAP calculation.

**TABLE 6: SAMPLE CALCULATION OF RENTAL ASSISTANCE PAYMENT**

<b>SELECT LESSER OF:</b>		
1. Subject Rent	\$750	Subject rent plus utilities
2. Ability to pay	\$650	30% of gross household income, if low income
	<b>\$650</b>	<b>Yields Base Rent</b>
<b>SUBTRACT BASE RENT FROM THE LESSER OF:</b>		
3. Comparable rent	\$800	Comparable rent + utilities
<b>OR</b>		
4. Actual rent paid	\$750	Actual new rent plus utilities
	<b>\$750</b>	<b>Yields New Rent Factor</b>
<b>RENTAL ASSISTANCE PAYMENT</b>		
5. Monthly need	\$100	Rent factor minus base rent (\$750- \$650)
<b>Payment</b>	<b>\$4,200</b>	<b>Monthly need multiplied by 42 months</b>

A residential tenant who has not been in residency for at least 90 days prior to the first written offer is only entitled to receive a moving expense payment unless they qualify under Last Resort Housing, which is discussed below. A tenant who has occupied the displacement property less than 90 days prior to HOPE, Inc.'s original written purchase offer to the property owner is eligible for Last Resort Housing based solely on income qualification.

Relocation payments under Section 104(d) of the Housing and Community Development Act of 1974 are not triggered as the Project will not demolish low income housing or convert existing low income housing to a use other than low income housing.

Tenants may choose to use their RAP for a down payment allowance and/or non-recurring closing costs when electing to purchase a replacement home.

## LAST RESORT HOUSING

The Uniform Act contains policies and procedures for implementing a Last Resort Housing Program. This program is authorized by statute if affordable replacement housing cannot be found within the basic statutory relocation amount of \$7,200 for tenant occupants, or if comparable decent safe and sanitary housing cannot be provided within the tenant's financial means, regardless if they do not meet the 90-Day occupancy requirement and are not specifically ineligible. Based on the rent being paid by the current tenants, it is assumed that all three (3) households will qualify for Last Resort Housing. In this event, additional rent supplements above the statutory limit of \$7,200 will be made to enable the displacees to rent a replacement site.

## RELOCATION ASSISTANCE TAX ADVISORY

Under the Uniform Act, relocation payments are not considered as income. No relocation benefit payment received by a displaced person shall be considered as income for the purposes of the Internal Revenue Code, or for the purpose of determining the eligibility or the extent of eligibility of the person, for assistance under the Social Security Act or any other Federal law, except for a Federal law providing low income housing assistance.

## VI. ADMINISTRATIVE PROVISIONS

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### NOTICES

Any official notice that CARE is required to provide to a resident shall be personally delivered or sent by certified or registered first-class mail, return receipt requested. Notices will be written in understandable language, and persons unable to read or understand any notice will be provided translation and counseling. Each notice will indicate the name, address, and telephone number of a person who may be contacted for answers to questions or other additional assistance.

The principal notices and letters are:

1. General Information Notice (See Exhibit B)
2. Notice of Temporary Displacement (See Exhibit C)
3. Notice of Eligibility (See Exhibit D)
4. 90-Day Notice To Vacate (See Exhibit E)
5. Notice of Non-displacement (See Exhibit F)
6. Lease Amendment for Temporary Unit (See Exhibit G)
7. Construction Temporary Move Letter (See Exhibit H)
8. Construction Temporary Move Back Letter (See Exhibit I)

The General Information Notice is intended to provide potential displacees with a description of CARE's relocation program, eligibility criteria, information regarding potential financial assistance, and appeal rights. The General Information Notices were issued on February 24<sup>th</sup> and May 5<sup>th</sup> of 2020. The Notice of Eligibility will contain a determination of eligibility for relocation assistance and a description or itemization of potential entitlement benefits.

No lawful occupant affected by this Project will be required to move without having received at least 90 days advance written notice of the earliest date by which the move will be necessary. A 90-Day Notice will not be issued to any residential displacee without first being given information regarding an available replacement dwelling.

The two principal notices for temporary relocation are:

- General Information Notice and Notice of Non Displacement
- Notice of Temporary Displacement

The General Information Notice and Notice of Non Displacement is intended to provide potential displacees with a description of CARE's relocation program, eligibility criteria, information regarding potential financial assistance, and appeal rights. This notice was sent via regular mail

on February 24<sup>th</sup> 2020 to residents of CARE Housing and on May 5<sup>th</sup> 2020 to residents of Housing Catalyst.

No lawful occupant affected by this Project will be required to move without having received at least 30 days advance written notice of the earliest date by which the move will be necessary. This will be done in the form of a “Notice of Temporary Displacement”. This 30-day notice will not be issued to any residential displacee without first being given information regarding an available replacement dwelling.

## LANGUAGE ASSISTANCE

Language assistance will be available for occupants who do not understand or speak English. CARE will provide documentation in foreign languages as requested by the displacees.

## RIGHT TO APPEAL

A displacee may file a written appeal with CARE if you believe that CARE has failed to properly determine eligibility for or the amount of a relocation payment. Payment limitations which have statutory maximums such as site search expenses or reestablishment expenses cannot be appealed. If a displacee submits an appeal, the displacee will be given a prompt and full opportunity to be heard. The displacee will also have the right to be represented by legal counsel or other representation in connection with the appeal, but solely at their own expense. CARE will provide assistance as needed in completing the appeal form, and will explain the appeal process to the displacee. A written appeal must be submitted to the relocation agent, and CARE will conduct an informal review of the case. The appeal must be filed no later than 60 days from the date you received written notification of CARE’s initial determination. If the appeal is denied, a written appeal must be submitted to:

Chief Engineer  
CDOT  
4201 East Arkansas Avenue  
Denver, Colorado 80222

## LAWFUL PRESENCE

Pursuant to Public Law 105-117, aliens not lawfully present in the United States are ineligible for relocation assistance, unless such ineligibility would result in an exceptional hardship to a qualifying spouse, parent or child. All persons seeking relocation assistance will be required to certify that they are a United States citizen or national, or an alien lawfully present in the United States.

## PROJECTED DATES OF DISPLACEMENT

The projected date for the displacement of the occupants within Phase I is the first quarter of 2021. It is anticipated that the temporary relocation will last approximately thirty days per phase. The tentative renovation schedule is detailed in Exhibit A, Draft Schedule.

CARE recognizes that eviction is permissible only as a last resort. Eviction will only take place in cases of illegal occupancy, nonpayment of rent, serious or repeated violations of the material terms of the rental agreement, a dangerous or illegal act in the unit, or if the occupants refuse all reasonable offers to comparable housing. In all cases, relocation records must be documented to reflect the specific circumstances surrounding the eviction. If a tenant is evicted for cause, all relocation benefits to which they may be entitled may be jeopardized. Tenants who are evicted retain their right to claim relocation benefits. CARE pledges that an eviction will not be undertaken for the purpose of evading its obligation to make payments under its Relocation Assistance Program, or other assistance to which a Displaced Person may otherwise be entitled.

## PROGRAM ASSURANCES AND STANDARDS

There are adequate funds to temporarily relocate all the households that will be displaced in order to accommodate this project. Relocation services will be provided to ensure that displacement does not result in different or separate treatment of households based on race, nationality, color, religion, national origin, sex, marital status, familial status, disability, or any other basis protected by the federal Fair Housing Amendments Act, the Americans with Disabilities Act, Title VI of the Civil Rights Act of 1964, Title VIII of the Civil Rights Act of 1968, and any other arbitrary or unlawful discrimination.

## RELOCATION COSTS

CARE pledges to appropriate, on a timely basis, the funds necessary to ensure the successful completion of the Project, in accordance with the Uniform Act.

## APPENDIX

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### EXHIBIT A – DRAFT SCHEDULE



## APPENDIX

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### EXHIBIT B – GENERAL INFORMATION NOTICE

## APPENDIX

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### EXHIBIT C – NOTICE OF TEMPORARY DISPLACEMENT

## APPENDIX

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### EXHIBIT D – NOTICE OF ELIGIBILITY

## APPENDIX

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### EXHIBIT E – 90-DAY NOTICE TO VACATE

## APPENDIX

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### EXHIBIT F – NOTICE OF NON-DISPLACEMENT

## APPENDIX

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### EXHIBIT G – LEASE AMENDMENT FOR TEMPORARY UNIT

## APPENDIX

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### EXHIBIT H – CONSTRUCTION TEMPORARY MOVE LETTER

## APPENDIX

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### EXHIBIT I – CONSTRUCTION TEMPORARY MOVE BACK LETTER